

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ANGELA L. FLIPPIN,

[DOB: 01/28/1972]

Defendant.

No. 2:23-cr-04026-RK-01

COUNT 1

18 U.S.C. 656

NMT 30 Years Imprisonment

NMT \$1,000,000 Fine

NMT 3 Year Supervised Release

Class B Felony

COUNT 2

26 U.S.C. 7206(1)

NMT 3 years

NMT \$250,000 Fine

NMT 1 year Supervised Release

Class E Felony

FORFEITURE ALLEGATION

18 U.S.C. § 982(a)(2) and

28 U.S.C. § 2561(c)

\$100 Special Assessment

INFORMATION

THE UNITED STATES ATTORNEY CHARGES THAT:

COUNT 1

(Embezzlement by Bank Employee)

18 U.S.C. § 656

Beginning in 2010 and continuing thereafter until approximately January 30, 2017, within Moniteau County, in the Western District of Missouri, and elsewhere, the defendant, **ANGELA L. FLIPPIN**, being an officer or employee of, the People's Bank of Moniteau County, a financial institution whose deposits are insured by the Federal Deposit Insurance Corporation, willfully misapplied, embezzled, abstracted and purloined money in excess of \$1,000 entrusted to the custody and care of the People's Bank of Moniteau County; all in violation of Title 18, United States Code, Section 656.

COUNT 2
(Fraudulent Income Tax Return)
26 U.S.C. § 7206(1)

On or about March 27, 2017, in the Western District of Missouri, the defendant, **ANGELA L. FLIPPIN**, a resident of Moniteau County, Missouri, willfully made and subscribed and filed and caused to be filed with the Internal Revenue Service a federal individual income tax return Form 1040 for the calendar year 2016, which was verified by a written declaration that it was made under the penalties of perjury and which the defendant did not believe to be true and correct as to every material matter. This tax return reported a taxable income of \$56,513.00, whereas, the defendant knew the said tax return failed to include additional income of approximately \$147,472.00, which resulted in additional taxable income for the year 2016; all in violation of Title 26, United States Code, Section 7206(1).

FORFEITURE ALLEGATION
18 U.S.C. § 982 and 28 U.S.C. § 2461(c)

The allegations contained in this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(2) and Title 28, United States Code, Section 2461(c).

Pursuant to Title 18, United States Code, Section 982(a)(2) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Section 656, the defendant, **ANGELA L. FLIPPIN**, shall forfeit to the United States of America any property, real or personal, which constitutes or is derived from proceeds traceable to the offense, including but not limited to the following:

Money Judgement

A money judgment representing proceeds of at least \$645,638.00 obtained by the defendant between 2010 and continuing thereafter until approximately January 30, 2017, that constitutes and

is derived from proceeds traceable to the offense set forth in the Information.

Substitute Assets

If any of the property described above, as a result of any act or omission of the defendant:

1. Cannot be located upon the exercise of due diligence;
2. Had been transferred or sold to, or deposited with, a third party;
3. Has been placed beyond jurisdiction of the court;
4. Has been substantially diminished in value; or
5. Has been commingled with other property which cannot be divided without difficulty,

The United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p) and by Title 28, United States Code, Section 2461(c).

Teresa A. Moore
United States Attorney

By /S/

Ashley S. Turner
Assistant United States Attorney
Missouri Bar No. 62314

Dated: _____